Remarks/Arguments

Applicants respectfully request consideration of the subject application as amended herein. This Amendment is submitted in response to the Office Action mailed April 2, 2009. Claims 1-20 and 22 are rejected.

In this Amendment, claims 1 and 22 have been amended. No claims have been canceled. New claim 40 has been added. It is respectfully submitted that the amendment does not add new matter.

Applicants reserve all rights with respect to the applicability of the Doctrine of Equivalents.

Claims Rejected Under 35 U.S.C. § 103

Claims 1-20 and 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Cheung, et al (U.S Publication No. 2002/0169760, hereinafter "Cheung") in view of Anderson, et al (U.S. Publication No. 2004/0093327, hereinafter "Anderson") and Kalagnanam, et al (U.S. Patent No. 6,873,967, hereinafter "Kalagnanam").

Cheung describes a typical search engine, where a user enters search keywords and then the search engine presents search results to the user. Web content is indexed by, for example, keyword density in web pages. Thus, a search engine may rank the indexed content for database search algorithms (Cheung, paragraph 0010). Cheung further describes that keywords and rankings of those keywords may be bid upon by many advertisers on a cost-per-click basis (Cheung, paragraphs 0023-0025). Based on a specific advertiser's maximum bid, Cheung will alter the ranking and placement so as not to exceed the advertiser's maximum bid (Cheung, paragraphs 0028-0039).

Anderson describes a system for targeting the placement of advertisements on web pages (Anderson, Abstract). The advertisements may be provided when a web page is requested, or a

search performed by an online search engine (Anderson, paragraphs 0030-0035). Furthermore, advertisements may be selected based on the content of a request web page (Anderson, paragraph 0052).

Kalagnanam describes a system for generating shopping lists with combined items. A shopping assistant processes requests from users including where the request includes user constrains for items (Kalagnanam, column 3, lines 39-59; Table 1). A server searches a database of available products, and returns a list of products matching the constraints (Kalagnanam, column 7, lines 11-37).

Amended claim 1 recites:

> A method comprising:
> identifying target objects on an electronic storefront Web site to which customer traffic is to be targeted, wherein identifying the target objects includes performing a search for the target objects located in an electronic catalog separate from the electronic storefront Web site;
> automatically generating search keywords for the target objects that are identified and found by the search by
> determining at least one applicable target type for each of the identified target objects, and
> generating the search keywords for each of the determined at least one applicable target types; and
> initiating purchase of the search keywords from one or more search partners.

(Emphasis Added).

Applicants respectfully submit that a combination of Cheung, Anderson, and Kalagnanam fail to describe or suggest "automatically generating search keywords for the target objects that are identified and found by the search by determining at least one applicable target type for each of the identified target objects, and generating the search keywords for each of the determined at least one applicable target types," as claimed.

As discussed above, Cheung describes a standard search engine where a user enters search terms, the terms are analyzed against indexed web pages, and results satisfying a search

algorithm are returned (Cheung, paragraphs 0009-0011). Although Cheung briefly describes typical search engine functions, Cheung fails to describe or suggest generating search keywords based on applicable target types of identified target objects. The Examiner relies on Cheung at paragraph 0010 as describing "automatically generating search keywords ...." However, in the passage relied upon by the Examiner, Cheung states:

> [0010] In a web-based search on an Internet search engine, a user enters a search term comprising one or more keywords, which the search engine then uses to generate, in real time, a listing of web pages that the user may access via a hyperlink. The search engines and web site directories of the prior art, however, rely upon processes for assigning results to keywords that often generate irrelevant search results. The automated search technology that drives many search engines in the prior art rely in large part on complex, mathematics-based database search algorithms that select and rank web pages based on multiple criteria such as keyword density and keyword location. The search results generated by such mechanisms often rely on blind mathematical formulas and may be random and even irrelevant.
>
> (Emphasis Added)

Thus, Cheung focuses on search engines that perform searches against user supplied search terms, and how advertisers can bid on those search terms. Merely noting that searches are performed on search terms, or that documents may be indexed based on search terms, however, fails to describe or suggest generating search terms, as claimed. Therefore, Cheung fails to describe or suggest "automatically generating search keywords for the target objects that are identified and found by the search by determining at least one applicable target type for each of the identified target objects, and generating the search keywords for each of the determined at least one applicable target types."

Anderson describes a system for targeting the placement of advertisements on web pages (Anderson, Abstract) and Kalagnanam describes a shopping assistant that processes shopping list requests from users (Kalagnanam, column 3, lines 39-59; Table 1). Neither determining the placement of an advertisement within a web page nor generating a shopping list with an

electronic shopping assistant describe or suggest generating search keywords based on applicable target types of target objects. Thus, Anderson and Kalagnanam fail to remedy the shortcomings of Cheung discussed above.

Therefore, Applicants respectfully submit that a combination of Cheung, Anderson, and Kalagnanam fails to describe or suggest "automatically generating search keywords for the target objects that are identified and found by the search by determining at least one applicable target type for each of the identified target objects, and generating the search keywords for each of the determined at least one applicable target types," as claimed. Therefore, claim 1, and claims 2-20 that depend therefrom are not obvious over a combination of Cheung, Anderson, and Kalagnanam.

Claim 22, as amended, recites similar limitations and feature as those discussed above in claim 1. Therefore, for at least the reasons discussed above in connection with claim 1, Cheung in view of Anderson in further view of Kalagnanam fails to teach or suggest each element of amended claim 22. Accordingly, reconsideration and withdrawal of the rejection of claim 22 are respectfully requested.

Conclusion

Applicant respectfully submits that in view of the amendments and discussion set forth herein, the applicable rejections have been overcome. Accordingly, the present and amended claims should be found to be in condition for allowance.

If a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact the undersigned at (408) 720-8300.

If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Respectfully submitted,

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Dated: July 2, 2009

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